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11 Specially Appearing for Defendant
12 CHARMING SHOPPES OF DELAWARE, INC.

13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16

17 SHAMEIKA MOODY, as an individual
and on behalf of others similarly situated,

18 Plaintiff,

19 vs.

20 CHARMING SHOPPES OF
21 DELAWARE, INC., a corporation, and
DOES 1 through 20, inclusive,

22 Defendant.
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Case No. C 07-06073 MHP

**DECLARATION OF ANTHONY
CAMORATTO IN SUPPORT OF
DEFENDANT CHARMING SHOPPES OF
DELAWARE, INC.'S MOTION TO
DISMISS FOR LACK OF PERSONAL
JURISDICTION**

Date: February 11, 2008

Time: 2:00 p.m.

[SPECIAL APPEARANCE ONLY]

1 I, Anthony Camoratto, declare as follows.

2 1. I am over eighteen years of age. I am the Vice President-HR Operations of
3 Defendant Charming Shoppes of Delaware, Inc. I have personal knowledge of the following and
4 am competent to testify thereto. Except as otherwise stated below, the following accurately
5 describes the facts as they have existed since at least January 1, 2002.

6 2. Defendant Charming Shoppes of Delaware, Inc. ("Defendant" or "CSDI")
7 provides certain shared services (such as payroll services and legal consultation) to various
8 operating subsidiaries of Charming Shoppes, Inc. ("CSI"), including Lane Bryant, Inc. ("Lane
9 Bryant"), which owns and operates the Lane Bryant stores in California, and other subsidiaries
10 that operate the Catherines and Fashion Bug retail stores.

11 3. As part of these shared services, Defendant currently acts as a common paymaster
12 for all employees employed in Lane Bryant stores. In this capacity, since at least January 1, 2002,
13 Defendant has caused all wage payments to be made to the employees of the Lane Bryant stores,
14 either by direct deposit from a CSDI bank account, or through payroll checks drawn by
15 Defendant from a CSDI bank account. Defendant maintains its bank accounts, from which these
16 wage payments are drawn, with Wachovia Bank in Charlotte, North Carolina.

17 4. I am informed that the named Plaintiff Shameika Moody was employed at a Lane
18 Bryant store in California. At all times since at least January 1, 2002, all Lane Bryant stores in
19 California have been owned and operated by Lane Bryant, and not by Defendant. Plaintiff
20 Shameika Moody was never employed by Defendant.

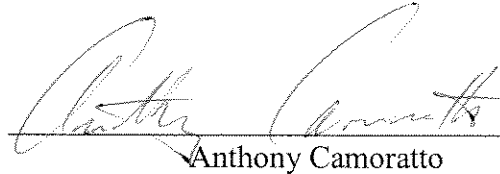
21 5. Defendant does not exert management control over the operations of other
22 subsidiaries of CSI. While Defendant provides certain shared services to subsidiaries of CSI
23 (including Lane Bryant), Defendant does not manage those operations.

24 6. Defendant does not manage or direct the work of any employees who report to or
25 are resident in California, including, without limitation, the employees who work in the Lane
26 Bryant stores. Defendant does not hire or select these employees; does not direct the work of
27 these employees; does not determine the amounts of wages to be paid to these employees; and
28 does not determine or implement overtime, meal period, final pay, or wage statement policies or

1 practices for these employees. In acting as common paymaster for employees at the Lane Bryant
2 stores, Defendant issues wage payments based on the employee and wage information that is
3 provided to it by Lane Bryant.

4 I declare under penalty of perjury under the laws of the United States that the foregoing is
5 true and correct.

6 Executed on January 4, 2008, at Berksaleen, Pennsylvania.

7
8 
9 Anthony Camoratto